

JASON M. FRIERSON  
 United States Attorney  
 Nevada Bar No. 7709  
 ZACHARY BERKOFF-CANE, WSBN 47988  
 Special Assistant United States Attorney  
 Office of the General Counsel  
 Social Security Administration  
 6401 Security Boulevard  
 Baltimore, MD 21235  
 Telephone: (410) 966-1542  
 Facsimile: (415) 744-0134  
 E-Mail: zachary.berkoff@ssa.gov  
 Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MIRA KHANY,  
 Plaintiff,  
 v.

KILOLO KIJAKAZI,  
 Acting Commissioner of Social Security,  
 Defendant.

Case No. 2:22-cv-01781-VCF

**UNOPPOSED MOTION FOR  
 EXTENSION OF TIME  
 (FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 19), currently due on July 5, 2023, by 30 days, through and including August 4, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on June 5, 2023, Defendant's counsel has completed five briefs in other matters. Defendant's counsel has another eight briefs due in the next thirty days.

1 Additional time is required to review the record, to evaluate the numerous issues raised in  
2 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's  
3 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as  
4 possible. This request is made in good faith and with no intention to unduly delay the proceedings,  
5 and counsel apologizes for any inconvenience.

6 On June 30, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no  
7 opposition to this motion.

8 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
9 to Plaintiff's Motion for Reversal and Remand, through and including August 4, 2023.

10  
11 Dated: June 30, 2023

Respectfully submitted,

12 JASON M. FRIERSON  
13 United States Attorney

14 /s/ Zachary Berkoff-Cane  
15 ZACHARY BERKOFF-CANE  
16 Special Assistant United States Attorney

17  
18 IT IS SO ORDERED:

19   
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 7-5-2023  
22 \_\_\_\_\_  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** to be served upon the following by:

**CM/ECF:**

Joshua R. Harris, Esquire  
josh@richardharrislaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 30, 2023

/s/ Zachary Berkoff-Cane  
ZACHARY BERKOFF-CANE  
Special Assistant United States Attorney